

**EXHIBIT A**

**Proposed Counter-Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:
	:
Gawker Media LLC, <i>et al.</i> , <sup>1</sup>	:
	:
	:
	:
Debtors.	:
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Chapter 11  
Case No. 16-11700 (SMB)  
(Jointly Administered)

**ORDER GRANTING IN PART AND DENYING IN PART THE MOTION OF  
GIZMODO MEDIA GROUP, LLC TO ENFORCE THE SALE ORDER**

Upon the motion (the “**Motion**”) dated August 21, 2017 of Gizmodo Media Group, LLC (“**Gizmodo**”) to Enforce the Sale Order and to Bar Certain Plaintiffs from Prosecuting their State Court Actions [Dkt. No. 985]; and upon the objection to the Motion by Pregame LLC d/b/a Pregame.com and Randall James Busack, professionally known as RJ Bell dated September 15, 2017 [Dkt. No. 1006] (the “**Objection**”); and upon Gizmodo’s reply to the Objection dated September 25, 2017 [Dkt. No. 1015]; and upon the record of the hearing on the Motion held on September 28, 2017; and upon the Memorandum Decision Regarding Motion to Enforce the Sale Order of this Court dated December 17, 2017 [Dkt. No. 1063] (the “**Decision**”);<sup>2</sup> and after due deliberation and sufficient cause appearing therefor, it is hereby

**ORDERED** that the Motion is granted in part and denied in part in accordance with and for the reasons set forth in the Decision.

<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a/ Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Plan Administrator, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Decision.

Dated: New York, New York  
December \_\_, 2017

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE